



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAVID P. LITTELL
COMMISSIONER

MEMORANDUM

TO: Board of Environmental Protection
FROM: Jeff Crawford, Bureau of Air Quality
DATE: December 3, 2009
RE: Post to Public Hearing: Chapter 123 Control of Volatile Organic Compounds
From Paper, Film and Foil Coating Operations

Statutory and Regulatory Reference:

A. Statutory authority.

38 MRSA Section 585-A provides that the Board of Environmental Protection "may establish and amend regulations to implement ambient air quality standards and emission standards. These regulations shall be designed to achieve and maintain ambient air quality standards and emission standards within any region and prevent air pollution."

B. Specific legal mandates requiring adoption.

Section 184 of the Clean Air Act requires states to implement or update reasonably available control technology (RACT) controls on all major VOC and NOx emission sources and on source categories covered by a Control Technique Guideline (CTG) document.

EPA developed a CTG that included paper coatings, *Control of Volatile Organic Emissions from Existing Stationary Sources-Volume II: Surface Coating of Cans, Coils, Paper, Fabrics, Automobiles and Light-Duty Trucks (1977)* and created an updated version, *Control Technique Guidelines for Paper, Film and Foil Coatings*, in September 2007.

Location/Applicability:

The proposed regulation will apply statewide.

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD, SUITE 6
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04679-2094
(207) 764-0477 FAX: (207) 760-3143

Description:

Section 184 of the Clean Air Act requires states to implement or update reasonably available control technology (RACT) controls on all major VOC and NOx emission sources and on source categories covered by a Control Technique Guideline (CTG) document. EPA defines RACT as the lowest emission limit that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility. In May 1977, EPA published a CTG for controlling VOC emissions from surface coating of paper, which it updated in September 2007.

The paper, film and foil coatings include coatings that are applied to paper, film and foil surfaces in the manufacturing of several major product types including pressure sensitive tape and labels, industrial and decorative laminates, and photographic film. This category also includes coatings applied during miscellaneous coating operations of corrugated and solid fiber boxes and folding paperboard boxes.

The current Chapter 123 only regulates surface coating of paper. The proposed amendments will add control requirements for the surface coating of film and foil substrates. In addition, the proposal incorporates work practices to minimize VOC emissions.

The Department is proposing these amendments as part of its effort to satisfy the RACT requirements mandated under the CAA and regulations related to the 1997 8-hour ozone NAAQS. According to the EPA's Final Rule to Implement the 8-Hour Ozone NAAQS (70 FR 71612, November 29, 2005), areas classified as "moderate" nonattainment or higher¹ must submit a revision to the SIP rules for all CTG categories. The proposed amendments to Chapter 123 will fulfill Maine's requirement to promulgate rules and implement controls meeting the 2007 CTG for paper, film and foil coatings.

Environmental Issues:

Volatile organic compounds contribute to ground-level ozone formation or smog which aggravates respiratory ailments such as asthma, bronchitis, and emphysema. The presence of ozone impedes the breathing of even healthy people.

Departmental Recommendation:

The Department recommends that the Board hold a public hearing on this proposal on January 7, 2010.

Estimated Time of Presentation:

10 minutes

¹ Maine is treated as a moderate nonattainment area under the Clean Air Act by way of its inclusion in the Ozone Transport Region.